

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

18 Civ. 08175 (ER)

– against –

ECF CASE

BARRY C. HONIG,
et al.

Defendants.
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**SUPPLEMENTAL DECLARATION OF ADAM C. FORD IN SUPPORT OF
DEFENDANT ROBERT LADD’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Adam C. Ford of Ford O’Brien Landy LLP, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly licensed to practice law in the State of New York. I am a partner with the law firm, Ford O’Brien Landy LLP, counsel for Defendant Robert Ladd in the above-captioned matter.
2. I respectfully submit this declaration in support of Defendant Robert Ladd’s Motion for Summary Judgment. I have personal knowledge of the facts below and, if called as a witness, I could and would testify competently thereto.
3. Attached hereto as **Exhibit 55** is a true and correct copy of an excerpt of the deposition transcript of Jay Kaplowitz, dated June 14, 2022.
4. Attached hereto as **Exhibit 56** is a true and correct copy of an excerpt of the deposition transcript of Arthur Marcus, dated June 21, 2022.
5. Attached hereto as **Exhibit 57** is a true and correct copy of an excerpt of the deposition transcript of Harvey Kesner, dated August 8, 2022.

6. Attached hereto as **Exhibit 58** is a true and correct copy of an excerpt of the deposition transcript of Robert Ladd, dated October 16, 2020, November 10, 2020, and August 5, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Adam Ford

Adam Ford
FORD O'BRIEN LANDY LLP
275 Madison Avenue, 24th Floor
New York, NY 10016
aford@fordobrien.com

Attorney for Defendant Robert Ladd